

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

UNITED STATES OF AMERICA)	INDICTMENT NO. 4:22-cr-114
)	
v.)	21 U.S.C. § 846
)	Conspiracy to Possess With
DENNIS RODRIGUEZ KINCHEN,)	Intent to Distribute and to
SHERMAN LEVON SCOTT,)	Distribute Controlled
ANGEL AMARAL,)	Substances (Cocaine,
JACQUELINE SOMESSO,)	Methamphetamine, Cocaine
TONY HELDORE)	Base, Heroin, Marijuana)
)	
)	21 U.S.C. § 841(a)(1)
)	Possession with Intent to
)	Distribute and Distribution a
)	Controlled Substances
)	(Cocaine, Methamphetamine,
)	Cocaine Base, and Heroin)
)	
)	21 U.S.C. § 856(a)(1)
)	Maintaining Drug-Involved
)	Premises
)	
)	18 U.S.C. § 924(c)
)	Possession of a Firearm in
)	Furtherance of a Drug
)	Trafficking Offense
)	
)	18 U.S.C. § 922(g)
)	Possession of a Firearm by a
)	Prohibited Person
)	
)	18 U.S.C. § 287
)	False, Fictitious, or Fraudulent
)	Claims
)	
)	18 U.S.C. § 1344
)	Bank Fraud
)	
)	18 U.S.C. § 1956(h)
)	Conspiracy to Launder Money
)	
)	18 U.S.C. § 2
)	Aiding and Abetting

AMEDNDED PENALTY CERTIFICATION

The undersigned Assistant United States Attorney hereby certifies that the maximum penalties for the offenses charged in the Indictment are as follows:

Count 1:

Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances

21 U.S.C. § 846

- Imprisonment of **not less than** 10 years or more than life;
- Fine of not more than \$10,000,000;
- Supervised release term of at least 5 years;
- \$100 special assessment.

Counts 2-4:

Maintaining Drug-Involved Premises

21 U.S.C. § 856(a)(1)

- Imprisonment of not more than 20 years;
- Fine of not more than \$500,000;
- Supervised release term of not more than 3 years;
- \$100 special assessment.

Counts 5-7, 9, 12, 15:

Possession with Intent to Distribute a Controlled Substance (28 grams or more of cocaine base, 500 grams of more of cocaine)

21 U.S.C. § 841(a)(1)

- Imprisonment of **not less than** 5 years, not more than 40 years;
- Fine of not more than \$5,000,000;
- Supervised release term of at least 4 years;
- \$100 special assessment.

Count 8:

Bank Fraud

18 U.S.C. § 1344

- Imprisonment of not more than 30 years;
- Fine of not more than \$1,000,000;
- Supervised release term of not more than 5 years;
- \$100 special assessment.

Count 10:

False, fictitious or fraudulent claims

18 U.S.C. § 287

- Imprisonment of not more than 5 years;
- Fine of not more than \$250,000;
- Supervised release term of not more than 3 years;
- \$100 special assessment.

Count 11:

Conspiracy Money Laundering

18 U.S.C. § 1956

- Imprisonment of not more than 20 years;
- Fine of not more than \$500,000, or twice the value of the property involved in the transaction, whichever is greater;
- Supervised release term of not more than 3 years;
- \$100 special assessment.

Count 13:

Possession of Firearm in Furtherance of a Drug Trafficking Crime

18 U.S.C. § 924(c)

Consecutive to any other sentence:

- Imprisonment of **not less than** 5 years, not more than life;
- Fine of not more than \$250,000,
- Supervised release term of not more than 5 years;

Count 14:

Prohibited Person in Possession of Firearm(s)

18 U.S.C. § 922(g)(1)

- Imprisonment for not more than 10 years;
- Fine of not more than \$250,000;
- Supervised release term of not more than 3 years;
- \$100 special assessment.

**However, should defendant be found to have three previous convictions for a violent crime or serious drug offense, or both, committed on occasions different from one another, the term of imprisonment would be not less than fifteen years, a fine not more than \$250,000, not more than five years of supervised release and a \$100 special assessment. 18 U.S.C. §924(e).*

Respectfully submitted,

DAVID H. ESTES
UNITED STATES ATTORNEY

s/ *Marcela C. Mateo*

Marcela C. Mateo
Assistant United States Attorney

CERTIFICATE OF SERVICE

This is to certify that I have on this day served all the parties in this case in accordance with the notice of electronic filing (“NEF”) which was generated as a result of electronic filing in this Court.

Submitted this 26th day of August 2022.

DAVID H. ESTES
UNITED STATES ATTORNEY

s/ Marcela C. Mateo
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